

business entity with a principal place of business in the city and state of New York.

4. Upon information and belief, defendant JACK RUSSELL GROUP is a

the laws of the State of New York with a place of business in the city and state of New York
ENTERTAINMENT, LLC ("MSL SPORTS") is a limited liability company organized under

3. Upon information and belief, defendant MSL SPORTS AND

of the State of New York with a place of business in the city and state of New York.
(hereinafter "MSL PRODUCTIONS") is a limited liability company organized under the laws

2. Upon information and belief, defendant MSL PRODUCTIONS, LLC,

its offices located at 701 Cottontail Lane, Somerset, New Jersey 08875;

BY AIR, is a CORPORATION organized under and domiciled in the State of New Jersey with

1332; in that the plaintiff DBA DISTRIBUTION SERVICES, INC. d/b/a DISTRIBUTION

1. This Court has jurisdiction under the provisions of 28 U.S.C. Section

JURISDICTION AND VENUE

respectfully alleges:

Plaintiff by its attorney, DAVID COHEN, complaining of the dependents

Defendant(s).

MSL PRODUCTIONS, LLC, MSL SPORTS
AND ENTERTAINMENT, LLC
and JACK RUSSELL GROUP.

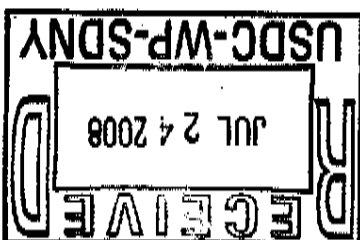
JUDGE DANIELS

-against-

Plaintiff(s),

DISTRIBUTION BY AIR
DBA DISTRIBUTION SERVICES, INC. d/b/a

SOUTHERN DISTRICT OF NEW YORK
UNITED STATES DISTRICT COURT



COMPLAINT
08 CIV. 6574
Civil Action No. _____

13. No portion of the outstanding amount has been paid by any of the

its agreement to work out the payment of the outstanding amounts

12. Subsequently, on or about December 17, 2007, **MSL SPORTS** reiterated

outstanding billing should be rebilled to **MSL SPORTS** as consulting services.

GROUP, that **MSL PRODUCTIONS** had insufficient funds at that time, and that the

MSL PRODUCTIONS or its business had been transferred to or acquired by **JACK RUSSELL**

11. On or about October 1, 2007 Plaintiff was advised by **MSL SPORTS** that

paragraphs 1 through 9 as though fully set forth herein.

10. Plaintiff repeats and reiterates each and every allegation set forth in

SECOND CAUSE OF ACTION

according to the account hereto annexed as Exhibit 'A'.

9. Defendant **MSL PRODUCTIONS** owes plaintiff the sum of \$218,077.14,

for the agreed and total amount of outstanding billing of \$ 218,077.14

performed numerous transportation shipments at the specific request of **MSL PRODUCTIONS**

8. On, about and between January 12, 2007 and October 15, 2007 Plaintiff

shipments throughout the United States and worldwide.

and international freight forwarding organization engaged in the expedited transportation of

7. At all times hereinafter mentioned, plaintiff was and still is a domestic

FIRST CAUSE OF ACTION

defendants are located in the District.

6. Venue is proper in the Southern District of New York in that all

thousand dollars, exclusive of interest and costs.

5. The amount in controversy exceeds the sum or value of seventy-five

(518) 784-5358
 Niverville, New York 12130
 19 East Shore Drive PO Box 299
 d/b/a DISTRIBUTION BY AIR
 DBA DISTRIBUTION SERVICES, INC.
 Attorney for Plaintiff
 JACOB COHEN ESQ. (DC-2331)

Dated: New York, New York
 July 18, 2008

of this action and such other relief as this Court may deem appropriate.

RUSSELL GROUP in the sum of \$ 218,077.14 with interest, plus the costs and disbursements

PRODUCTIONS, LLC, MSL SPORTS AND ENTERTAINMENT, LLC and JACK

WHEREFORE, plaintiff demands judgment against defendants **MSL**

Plaintiff for payment of the outstanding amount of \$ 218,077.14

18. Based upon the foregoing, **JACK RUSSELL GROUP** is liable to

transferred property.

Law Plaintiff may have such conveyance set aside, disregard the conveyance, or levy upon the

17. Pursuant to the provisions of the New York Debtor and Creditor

conveyance.

RUSSELL GROUP rendered **MSL PRODUCTIONS** insolvent and is a fraudulent

16. Upon information and belief the conveyance of assets to **JACK**

paragraphs 1 through 14 as though fully set forth herein.

15. Plaintiff repeats and reiterates each and every allegation set forth in

THIRD CAUSE OF ACTION

the outstanding amount of \$ 218,077.14 to the Plaintiff.

14. By reason of the foregoing **MSL SPORTS** is liable for the payment of

defendants to plaintiff.

"U" - 81 HX9

Page: 1

Customer Aging Detail By Name

1479418*	01/12/07	848.49
1465474	01/13/07	2,620.93
1465475	01/13/07	2,576.39
1495568	01/19/07	2,951.13
1495569	01/19/07	1,890.30
142305	01/22/07	393.37
1465473	01/23/07	718.54
1495371	01/23/07	760.66
1495402	01/27/07	2,349.48
1495433	01/31/07	197.50
1495420	01/31/07	100.00
143221	02/02/07	305.24
1495454	02/05/07	4,256.75
1495468	02/05/07	438.03
1491451	02/06/07	450.00
1464827	02/07/07	225.00
1495488	02/07/07	1,800.00
1464826	02/08/07	255.70
1433337	02/08/07	525.00
1495652	02/12/07	207.50
1495653	02/12/07	207.50
1495657	02/12/07	245.00
1495654	02/12/07	245.00
143794	02/13/07	2,560.69
1479493	02/13/07	3,325.00
1495666	02/14/07	1,624.05
144864	02/14/07	87.75
144631	02/14/07	245.00
1479490	02/14/07	1,550.00
144750	02/15/07	175.22
1495678	02/15/07	137.75
1479456	02/16/07	545.69
1479460	02/16/07	5,700.00
1495691	02/17/07	2,745.74
1495700	02/20/07	296.24
1495711	02/22/07	616.07
144752	02/23/07	290.22
145740	02/23/07	178.70
1479471	02/23/07	5,825.00
1495732	02/26/07	375.35
2975825	02/27/07	156.14
1495751	02/28/07	2,150.00
1495751a	02/28/07	957.73
146313	03/01/07	306.51
102598	03/02/07	2,877.02
1479480	03/02/07	684.45
1479481	03/02/07	786.20
1479482	03/02/07	227.60
1495960	03/03/07	425.00

Phone

EWR65848 - MSL PRODUCTIONS CONT: BRUCE EXT 241 SLS: HAREWR

Invoice	Inv Date	30 Days	31-60 Days	61-90 Days	Over 90 Days
Date: 06/20/08	Age by: Inv Date				
Time: 12:26:57	Aging Date: 06/20/08				
DISTRIBUTION BY AIR					
Customer Aging Detail By Name					
Page: 1					

Page: 2

Customer Aging Detail By Name

146682	03/08/07	313.98
1495961	03/09/07	1,100.00
147284	03/09/07	178.39
1495885	03/10/07	2,937.71
147410	03/12/07	570.88
1495968	03/13/07	1,700.00
1495971	03/15/07	1,375.00
1493969	03/15/07	275.00
146483	03/16/07	2,349.75
1493909	03/19/07	267.83
1493932	03/21/07	146.25
1493933	03/21/07	146.25
1495975	03/21/07	4,775.00
1434380	03/23/07	498.26
1493964	03/24/07	492.75
1493987	03/27/07	17.55
1494109	03/29/07	1,850.00
1494109A	03/29/07	1,024.82
1494113	03/30/07	4,150.00
149614	03/30/07	556.82
1494030	03/30/07	1,765.89
1494116	04/02/07	1,700.00
1494119	04/02/07	1,150.00
149944	04/04/07	844.88
1494139	04/06/07	3,976.13
1494164	04/10/07	1,550.00
150798	04/11/07	434.27
150848	04/11/07	243.91
150900	04/15/07	2,025.00
1494296	04/16/07	146.80
1494214	04/19/07	2,850.00
1494236	04/23/07	2,100.00
1494246	04/25/07	1,675.00
158772	04/27/07	297.50
1495536	04/27/07	1,486.45
1495538	05/01/07	450.10
1515081	05/05/07	975.00
1494555	05/05/07	2,859.95
1494553	05/07/07	1,540.22
1494592	05/10/07	261.56
153944	05/10/07	2,925.00
1494593	05/11/07	544.91
153944A	05/13/07	2,925.00
1515145	05/14/07	410.12
1515158	05/15/07	164.32
149947	05/15/07	275.00
1515184	05/19/07	2,841.33
153944B	05/19/07	2,925.00
1515246	05/21/07	1,350.00
1507524	05/21/07	177.01
1515197	05/22/07	204.68

Invoice

Inv Date1-30 Days

31-60 Days

61-90 Days

Over 90 Days

Date: 06/20/08
Time: 12:26:57
Age by: Inv Date
Customer Aging Detail By Name
DISTRIBUTION BY AIR
Aging Date: 06/20/08

Page: 2

Page: 3

Customer Aging Detail By Name

1530610	08/28/07	3,525.00
165319	08/24/07	485.52
162812	08/24/07	1,999.80
148758	08/23/07	406.80
165242	08/23/07	525.00
165219	08/23/07	475.00
165392	08/23/07	175.00
1530479	08/22/07	448.50
1651278	08/22/07	367.50
165127	08/22/07	367.50
165032	08/22/07	650.00
165036	08/22/07	450.00
1648388	08/22/07	542.50
165028	08/22/07	542.50
164428	08/16/07	149.76
1507544	08/16/07	244.00
164292	08/16/07	1,950.00
163486	08/15/07	1,800.00
162763	08/02/07	230.00
1515599	07/28/07	2,846.10
115319	07/27/07	149.76
161379	07/25/07	372.48
1465354	07/22/07	1,185.00
1491496	07/20/07	189.00
161378	07/19/07	164.00
161185	07/17/07	986.44
1609688	07/16/07	90.00
160968	07/16/07	783.84
160599	07/12/07	342.69
160041	07/10/07	5,770.00
1293288	07/05/07	150.00
159926	07/05/07	245.00
159447	07/02/07	180.28
159551	07/01/07	1,000.00
158850	06/22/07	363.80
156933	06/18/07	2,959.72
158031	06/15/07	376.68
157343	06/11/07	659.00
15152538	06/06/07	595.00
1515382	06/05/07	2,908.64
1515253	06/05/07	595.00
1515372	06/04/07	2,579.21
1494065	05/26/07	467.82
1494067	05/26/07	804.69
1494064	05/26/07	2,011.88
1494066	05/26/07	2,870.11
153944C	05/26/07	2,925.00
155431	05/24/07	1,375.00
155556	05/23/07	4,075.00
155571	05/23/07	855.86
155472	05/22/07	1,850.00

Invoice

Inv Date: 30 Days

31-60 Days

61-90 Days

Over 90 Days

Date: 06/20/08
Time: 12:26:57
Customer Aging Detail By Name
DISTRIBUTION BY AIR
Aging Date: 06/20/08

Page: 3

Customer Aging Detail By Name

[illegible]

Invoice	Inv Date	1-30 Days	31-60 Days	61-90 Days	Over 90 Days
15306104	09/04/07				3,750.00
1507550	09/06/07				553.64
166804	09/10/07				1,275.00
167887	09/12/07				347.23
1507558	09/13/07				850.00
168055	09/14/07				2,345.46
1475010	09/30/07				9.00
1535507	09/30/07				826.00
1508700	11/01/07				9.00
1508691	11/30/07				9.00
1509170	01/31/08				9.00
1485781	03/01/08				9.00
1486187	04/01/08				9.00
Total	195,477.51	.00	.00	9.00	195,468.51

Customer Aging Detail By Name
Distribution By AIR
Date: 06/20/08
Time: 12:26:57
Age by: Inv Date
Aging Date: 06/20/08

† **ଅବସ୍ଥିତି**